



ETHICAL REPORTING POLICY

Purpose and Scope

Canadian Apartment Properties REIT ("CAPREIT") and its Canadian affiliates (collectively, the "Company", "we", "us", or "our") are committed to fostering a culture that values business and personal ethics, maintaining the highest standards of integrity and accountability in our business affairs and ensuring continued compliance with all applicable legal and regulatory requirements.

The purpose of this Ethical Reporting Policy (the "Policy") is to establish a framework for CAPREIT Representatives (defined below) and any interested third parties, to report events, concerns of misconduct, other wrongdoing or any other Incident (defined below) through a confidential reporting mechanism for review and investigation, without fear of retaliation.

This Policy applies to CAPREIT Representatives and any interested third parties.

Definitions

CAPREIT Representatives means collectively CAPREIT, its Canadian affiliates, and their officers, trustees, directors, employees, contract employees and agents.

Ethics Reporting Committee ("ERC") means the internal management committee of CAPREIT with oversight and investigation responsibilities over certain types of Incidents.

Incident includes but is not limited to:

- Any activity or omission by a CAPREIT Representative which violates our Code of Business Ethics and Conduct (the "Code") or its associated policies;
- An intentional violation of Company policies;
- The failure to take action by a CAPREIT Representative who has knowledge of another CAPREIT Representative's unethical behaviour;
- Falsifying or intentionally omitting financial transactions, material misrepresentations in any written or oral disclosure made by or on behalf of CAPREIT;
- Improper accounting practices or violation of internal controls;
- Theft, fraud including misappropriation of assets, bribery, corruption or anti-competitive behaviour;
- Bribery & corruption
- Matters threatening the health, safety or security of any CAPREIT Representative or resident;
- An unexpected event or accident that results in substantial or serious harm to property or to an individual;
- A hardware security breach, cyber security breach or privacy breach;
- The misleading or coercion of internal or external auditors;
- Any activity which may constitute a criminal act or a violation of applicable laws or regulations;

- An investigation, pending investigation, complaints or non-routine inquiries by a regulatory body governing CAPREIT, including but not limited to whistleblower complaints received by the Ontario Securities Commission;
- An act or threat of retribution or retaliation against a CAPREIT Representative for reporting an Incident or for participating in an investigation relating to an Incident.

Duty to Report Ethical Concerns

CAPREIT is dedicated to fostering a culture of integrity, accountability, and ethical responsibility. To maintain these values, every CAPREIT representative has a **duty to report** any suspected unethical, illegal, or improper conduct that could compromise the integrity, or reputation of our organization

Why Reporting is Important

- **Protecting the Organization and Stakeholders:** By reporting ethical concerns, CAPREIT representatives help safeguard the company's reputation, financial health and stakeholder trust. Early reporting enables CAPREIT to address issues promptly, minimizing potential harm.
- **Upholding Ethical Standards:** Reporting misconduct reinforces our collective commitment to the highest standards of honesty, transparency and accountability.
- **Creating a Safe and Respectful Workplace:** Ethical reporting helps to ensure a positive and respectful workplace by addressing the actions or behaviors that may harm individuals, disrupt teamwork or violate company policy.

Right to Speak Up

CAPREIT Representatives have the right to voice their concerns without fear of retaliation or adverse consequences. As such, CAPREIT ensures:

- **Protection from Retaliation:** Representatives who report in good faith are protected from retaliation, including any form of demotion, harassment, or discrimination. Retaliation of any kind is strictly prohibited and will be subject to disciplinary action.
- **Confidential Reporting Options:** Representatives have access to confidential reporting options, including an anonymous reporting platform (ClearView). CAPREIT ensures that all reports will be handled discreetly, and information will only be disclosed on a need-to-know basis.
- **Supporting Environment:** CAPREIT strives to foster an open and supportive environment where Representatives feel safe and empowered to speak up about any concerns related to ethics, compliance, or workplace integrity.

Methods for Reporting

CAPREIT is committed to providing multiple, accessible, and secure methods for Representatives to report ethical concerns. These options are designed to ensure that individuals report in a way that feels comfortable and safe for them, with the assurance that their report will be handled ethically and fairly. CAPREIT Representatives and any interested third parties may report an Incident in any number of ways including:

Internal Reporting Channels

- Directly to your manager, department head or any senior manager through any means of communication including verbally in person, by email, text or phone;
- Through Ops In a Box at <https://opsinabox.refineddata.com/riskapp/app/incident.html#/>
- To Human Resources at humanresources@capreit.net
- To the Information Technology department at help@capreit.net
- To the Compliance & Ethics department at compliance@capreit.net
- To the Privacy Office at privacy@capreit.net
- To the Ethics Reporting Committee at erc@capreit.net
- Trustees and executives may also report to the Board Chair and/or Chair of the Governance and Nominating Committee.

Confidential External Reporting Channels

Anonymously through the services of an independent service provider:

ClearView Strategic Partners Inc. ("ClearView")
Website (www.clearviewconnects.com)
Telephone reporting line (1-866-697-4907)

Incidents reported through Clearview are forwarded to the Chair of CAPREIT's Board and the Chair of the Governance, the Nominating Committee and the EVP of Risk, Compliance & Ethics ("EVP, Compliance").

What to Report

Incident reports should generally include the following information:

- **Detailed Account of the Incident:** Describe the issue or misconduct in as much detail as possible, including specific actions, conversations or behaviors observed
- **Date, Time, and Location:** Provide the date(s), time(s) and places(s) where the incident occurred to help establish a timeline,
- **Individuals Involved:** List all individuals involved, including names, job titles and departments, if known.
- **Nature of the misconduct:** Explain the type of misconduct (e.g., fraud, safety violation, conflict of interest) and why it is considered unethical or improper according to company policy. Include any supporting evidence that may be relevant to the incident.
- **Steps taken:** Please provide details of steps taken (if any) prior to making a report.

Handling Incidents

Once reported, Incidents will be communicated to the Compliance and Ethics Department. Based on the nature of the Incident and subject to confidentiality requirements, Compliance & Ethics will notify the relevant department heads, the ERC and/or the Board Chair, as applicable, for the purpose of conducting an investigation. In order to protect the reputation of those implicated in the Incident and to uphold the integrity of the process, individuals generally will not be notified if

they have been implicated in an Incident unless it becomes necessary to inform them in the course of conducting the investigation. The Compliance and Ethics Department will log and report on the conclusion of the investigation to the person filing an Incident report.

Respect, Justice and Closure

We value when CAPREIT Representatives speak up as this fosters a culture of transparency and trust.

Accordingly, all Incident reports will be taken seriously, and all parties will be treated with respect throughout the investigation process. All Incidents will be investigated with a goal to providing closure and justice.

A record of all Incidents as well as an Incident report (including investigation findings and recommendations for remediation) will be prepared and maintained by the Compliance and Ethics Department, and in the case of incidents involving trustees or the executive leadership team, will be prepared and maintained by the Chair of the Board.

Confidentiality

At the discretion of the reporting individual reporting may be submitted on a confidential basis or anonymously, as outlined above. CAPREIT shall use reasonable efforts to protect the confidentiality and anonymity of the reporting individual as well as anyone implicated in the Incident. Confidential information about a reported Incident may require to be provided to external auditors, law enforcement or a regulatory agency where it appears that illegal activity or a regulatory breach has or may have occurred.

Acting in Good Faith

Anyone filing an Incident report under this Policy must be acting in good faith and have an honest belief that the complaint is a serious matter requiring review and investigation. Any incidents based on allegations that have no factual basis or that are found to be intentionally misleading or malicious will be viewed as a serious offence and treated appropriately.

Retaliation Prohibited

CAPREIT strictly prohibits and does not tolerate any form of retaliation or retribution against CAPREIT Representatives who file reports in accordance with this Policy in good faith. CAPREIT Representatives shall be protected from retaliation, including any threats or form of discipline, reprisal, intimidation or other form of retaliation for participating in any activity protected by law.

CAPREIT Representatives who are found to have engaged in retaliation or retribution in connection with an Incident report will be subject to disciplinary or rehabilitative action. Such disciplinary or rehabilitative action may include but is not limited to a warning or reprimand letter; loss of salary increase or bonus; suspension with or without pay; termination; a record in the employment file; a change in work assignment; and/or additional training.

Right to Withdraw

At any stage during the investigative process, the reporting individual has the right to withdraw from any further action in connection with the Incident. CAPREIT, however, may continue to pursue the matter if it believes the continued investigation is appropriate in the interest of CAPREIT (for example, if there are concerns that the Incident report was withdrawn as a result of possible retaliatory behaviour or there are previous submissions that are similar).

Liability

This Policy is not intended to give rise to civil liability on the part of CAPREIT or their respective trustees, directors or officers to unitholders, security holders, customers, suppliers, competitors, employees or other persons, or to any other liability whatsoever on their part.

This Policy was approved by the Governance and Nominating Committee on February 12, 2025 and the Board of Trustees of CAPREIT on February 13, 2025 and may be amended from time to time.